



March 12, 1992

Mr. Dennis Schubbe
Remediation Programs Division
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P.O. Box 464
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IT Project No. 304908

Revisions to Final Phase I RFI/RI Work Plan
for the Original Process Waste Lines (Operable Unit No. 9)
EG&G Project No. BA68163PB, Modification No. 3
Task Order No. 8

Dear Mr. Schubbe;

This letter transmits two copies of the revised text, tables, and figures of the Final Phase I RFI/RI Work Plan for the Original Process Waste Lines (Operable Unit No. 9), and two copies of the revised responsiveness summary for CDH and EPA comments. These revisions incorporate DOE comments received on March 4, 1992 on the final work plan and responsiveness summary that were transmitted to EG&G on February 20, 1992. The following is a summary of the DOE comments and associated revisions.

WORK PLAN REVISIONS

Table of Contents Revised to reflect changes to text.

- Sec. 2.3.3.2 (1) Stated that feasibility of performing hydraulic conductivity measurements on new OU1 and OU2 wells is still being evaluated
- (2) Stated that hydraulic conductivity data for wells in the vicinity of the OPWL are limited to one well screened across the bedrock/alluvium contact. Identified this well and the value measured.
- Sec. 2.5.4 (1) Changed all items in bulleted list to match revised Figure 2-8 terminology

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- (2) Changed "Surface Water" to "Surface Water/Sediments" throughout third bulleted item
- (3) Stated in introduction to bulleted list that Figures 2-8 and 2-9 are complete pathway assessments, while the bulleted items stop at transport media consistent with the scope of Phase I
- (4) Changed air pathway bulleted item to reflect that inhalation will be quantitatively evaluated in Phase I.

Table 2.5

- (1) Changed footnotes to accurately reflect which values are ranges and which are averages
- (2) Removed all values except those for Rocky Flats Alluvium and renamed table.

Figure 2-8

- (1) Changed "Surface Runoff" to "Surface Runoff/Erosion"
- (2) Changed "Precipitation" to "Sedimentation/Precipitation"
- (3) changed arrow coming out of "Sedimentation/Precipitation" box to connect with all release mechanisms.

Section 5.6

Indicated that inhalation will be quantitatively evaluated in Phase I.

Sections 7.2.1, 7.3.1.2, 7.3.1.3, 7.3.2.1, Table 7.2, Figure 7-3, Figure 7-6

Revised as necessary to include sampling of bedrock immediately beneath the alluvium/bedrock contact. Indicated that alluvium and bedrock sample analytical results would be evaluated against background values provided for each unit in the Final Background Geochemical Characterization Report.

Section 7.2.5

Inserted "using a high-purity germanium detector."

Section 7.7

- (1) Indicated that limited air sampling may be performed to support evaluation of the soil inhalation exposure pathway
- (2) Changed name of section to Air Monitoring and Sampling Procedures.

Section 8.1

Clarified that surface soil inhalation, ingestion and dermal contact exposure pathways will be quantitatively evaluated during Phase I.

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<u>Section 8.3.5</u>	Indicated that choice of appropriate exposure assessment model will be discussed in the BRAP technical memorandum required under VII.D.1.b of the IAG Statement of Work.
<u>Table 10.1</u>	Added EMD OP for threatened and endangered species (to be provided by Mark Brooks of EG&G).
<u>Section 11.0</u>	Made list of EMD OPs consistent with Table 10.1.

COMMENT RESPONSE REVISIONS

<u>CDH-G3</u>	Specified which text was revised.
<u>CDH-G7</u>	Revised response per text revisions to Section 2.3.3.2.
<u>CDH-S2</u>	Changed 2.3.3.4 to 1.3.3.4.
<u>CDH-S6</u>	Corrected typographical error ("b\not").
<u>CDH-S7</u>	Corrected typographical error ("b\not"). Also specified which text in conceptual model was revised.
<u>CDH-S14</u>	Stated that actual number of samples to be collected will be included in technical memoranda that address site-specific FSPs.
<u>CDH-S20</u>	Corrected typographical error ("CPWL").
<u>CDH-S25</u>	Changed 7.2.3.1 to 7.3.2.1.
<u>CDH-S26</u>	Revised to include sampling of bedrock immediately beneath the alluvium/bedrock contact.
<u>EPA-G9</u>	Revised to reflect that soil inhalation pathway will be quantitatively evaluated during Phase I.
<u>EPA-G10</u>	Revised to reflect that soil inhalation pathway will be quantitatively evaluated during Phase I.
<u>EPA-S3</u>	Specified where test pit spacing is explained in text.
<u>EPA-S6</u>	Changed 7.3.4.1 to 7.2.4.1 and 3.0 to 2.0 in comment.
<u>EPA-S13</u>	Revised response per text revisions to Section 8.3.5.

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IT Corporation appreciates the opportunity to provide this service to EG&G Rocky Flats, Inc. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Rayburn".

Chris Rayburn
Task Manager

cc: Greg Williams (w/o encl.)
Less Osborne (w/o encl)